



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Edward J Boyle
Northern Division, Naval Facilities Engineering Command
10 Industrial Highway
Mail Stop #82
Lester, PA 19113-2090

OCT 01 1998

Re: Revised Work Plan for Underground Storage Tank Removal and Abandonment in Place

Dear Mr. Boyle:

The New Jersey Department of Environmental Protection (NJDEP) is in receipt of the Revised Work Plan for Underground Storage Tank (UST) Removal and Abandonment in-Place dated August 12, 1998. This document is a revision to an earlier version dated February 27, 1998. Upon review, NJDEP has the following comments.

1. General Comments

- a. All of the USTs must be shown on a scaled base map. Then the "blown up" maps will make more sense.
- b. There is no contingency if the post-excavation samples are found to be contaminated.
- c. The Work Plan does not include submittal of a report at the conclusion of the remedial action. A Remedial Action Report meeting the N.J. Technical Requirements for Site Remediation (Tech Regs), N.J.A.C. 7:26E, specifically, N.J.A.C. 7:26E-6.6, must be submitted for NJDEP review.
- d. A schedule of activities must be submitted.

2. Section 2.1 – Delivery Line Piping

This section should be revised to reflect that there are six USTs listed for closure and not five.

3. Section 3 – Tank Abandonment in Place

To abandon an UST in place, the requirements of the Tech Regs, specifically, N.J.A.C. 7:26E-6.3(b)6ii, must be met. This includes cleaning out the UST before being filled with a flowable grout material. The Work Plan does not make this clear.

4. Section 4 – Post-Excavation Sampling

- a. The post-excavation sampling requirements for USTs, specifically N.J.A.C. 7:26E-6.3(b)6i, must be met. The need for sidewall samples is dependent on the specific gravity of the contents of the USTs. Please refer to the Tech Regs for guidance. In addition, the sampling requirements for abandoned in-place USTs, specifically N.J.A.C. 7:26E-6.3(b)6ii, must be met, including sampling through the UST unless one of the listed conditions it met. The Work Plan does not make this clear.
- b. Soil sampling must be in accordance with the methanol preservation method, N.J.A.C. 7:26E-2.1(a)4, for volatile organic compounds.
- c. The analytical results must be compared to *all* of the N.J. Soil Cleanup Criteria, not just the Non-Residential Direct Contact.

5. Section 5 – Overburden, Backfill Material and Drum Sampling

- a. The reuse of the “overburden” and “backfill material” in the excavation must meet the requirements for reuse of contaminated soil, specifically N.J.A.C. 7:26E-6.4(d). Composite soil samples are *not* acceptable.
- b. Depending on the ultimate disposal of the drummed tank residual liquid and tank cleaning rinsates, the proposed analyses may not be required. Please check with the disposal facility for the appropriate requirements.

Because of the nature of these comments, NJDEP requires that a revised Work Plan be submitted.

If you have any questions regarding this letter, please do not hesitate to contact me at (609) 633-1494.

Sincerely,



Donna L. Gaffigan, Case Manager
Bureau of Federal Case Management